

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

THE UNITED STATES OF AMERICA

v.

OLUWASEUN ADEKOYA

2013-cr-98-01-JL

STIPULATIONS

The parties enter into the following stipulations.

- The parties stipulate and agree that Mr. Adekoya had no access to the internet from April 4, 2013 to August 29, 2013.
- Sewaren, New Jersey is 238 miles from Boston, Massachusetts. According to a query for “Directions” run on Google Maps, selecting “automobile” as the method of travel, it would take 3 hours and 48 minutes to travel from Sewaren, New Jersey to Boston, Massachusetts, if there was no traffic along that route.
- According to www.TripAdvisor.com, the average flying time from Atlanta, Georgia to Boston, Massachusetts is 2 hours and 42 minutes.
- The zipcode 30274 includes Riverdale, Georgia.
- The zipcode 30260 includes Morrow, Georgia.

The parties further agree that the jury should be read First Circuit Pattern

Criminal Jury Instruction 2.01, as follows:

The evidence in this case includes facts to which the lawyers have agreed or stipulated. A stipulation means simply that the government and the defendant

accept the truth of a particular proposition or fact. Since there is no disagreement, there is no need for evidence apart from the stipulation. You must accept the stipulation as fact to be given whatever weight you choose.

Respectfully submitted,

Theodore Lothstein
N.H. Bar. No. 10562
Lothstein Guerriero, PLLC
3 N. Spring Street
Concord, NH 03301
TEL: (603) 513-1919

CERTIFICATE OF SERVICE

I hereby certify that this pleading was electronically filed through the ECF system, and forwarded by electronic mail this 14th day of July, 2014 to Arnold Huftalen, Esq., Assistant United States Attorney, United States Attorney's Office, and in hand to Mr. Adekoya.

Theodore Lothstein